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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

**INTERNATIONAL PAYMENT ADVISORS
LTD, a Nevada limited liability company,**

Plaintiff,

v.

**PAYSAFE SERVICES (US) LLC, a Delaware
Corporation; and DOES 1-10 inclusive,**

Defendants.

Case No.: 2:19-cv-203-RFB-VCF

**STIPULATION AND ORDER TO
AMEND COMPLAINT AND
WITHDRAW DEFENDANT'S
MOTION TO DISMISS**

Plaintiff International Payment Advisors LTD ("Plaintiff"), by and through its counsel of record, Kravitz, Schnitzer & Johnson, Chtd., and Glaser Weil Fink Howard Avchen & Shapiro LLP, and Defendant Paysafe Services (US) LLC ("Defendant"), by and through its counsel of record, Greenberg Traurig, LLP, hereby stipulate and request that the Court enter an order: (1) permitting Plaintiff to file an Amended Complaint; (2) withdrawing Defendant's Motion to Dismiss and attached declarations and exhibits (ECF No. 14); and (3) granting Defendant fourteen (14) days from the date of Plaintiff's filing of the Amended Complaint in which to file its response.

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This stipulation is made and based upon the following:

1. Plaintiff filed its Complaint on February 1, 2019, in which it alleges that Defendant committed certain breaches of contract and of the implied covenant of good faith and fair dealing.

[ECF No. 1]

2. Defendant thereafter filed a Motion to Dismiss the Complaint for lack of subject matter jurisdiction. [ECF No. 14]

3. In the interests of judicial economy and the conservation of resources, the parties agree to permit Plaintiff to file an Amended Complaint and to withdraw Defendant's Motion to Dismiss and attached declarations and exhibits, without prejudice.

4. Defendant shall have fourteen (14) days from the date of the filing of the Amended Complaint in which to file its response.

5. Plaintiff reserves its rights to assert any arguments related to Defendant previously filing a motion under Rule 12(b) that is being withdrawn pursuant to this Stipulation and Order, including, but not limited to, its rights pursuant to Rule 12(g)(2) and Rule 12(h).

6. This stipulation is entered into in good faith and not for purposes of delay.

DATED this 10th day of April 2019.

DATED this 10th day of April 2019.

KRAVITZ, SCHNITZER & JOHNSON, CHTD.

GREENBERG TRAURIG, LLP

/s/ Adam Wax

/s/ Jason Hicks

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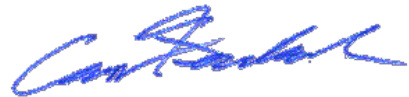
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Attorneys for Plaintiff

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: April 10, 2019

IT IS HEREBY ORDERED
that the Amended Complaint
must be filed on or before
April 17, 2019.